



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY  
**DEPARTMENT OF SOCIAL SERVICES**  
744 P Street • Sacramento, CA 95814 • [www.cdss.ca.gov](http://www.cdss.ca.gov)



EDMUND G. BROWN JR.  
GOVERNOR

August 27, 2015

Susan von Zabern, Director  
Riverside County Department of Public Social Services  
4060 County Circle Drive  
Riverside, CA 92503

Dear Ms. Zabern:

This letter is to advise you that the Corrective Action Plan you submitted in response to the results of our September 15, 2014 Civil Rights Compliance Review is approved.

We will be monitoring the implementation of your corrective action items through your Civil Rights Coordinator.

If you have any questions, please contact Cindy Guzman, Consultant at (916) 654-2117. You may also contact your consultant by e-mail at [cindy.guzman@dss.ca.gov](mailto:cindy.guzman@dss.ca.gov).

Sincerely,

***Original signed by Bureau Chief***

JIM TASHIMA, Chief  
Civil Rights Bureau  
Human Rights and Community Services Division

c: Nancy Chung, Administrative Service Manager 1/Civil Rights Coordinator  
Jennifer Faler, Civil Rights Investigator

Kim McCoy Wade, Chief  
CalFresh Policy Bureau

Carlos Ocampo, Chief  
Field Operations Bureau

Taadhimeda Haynes  
Staff Services Manager I

Sysvanh Kabkeo, Chief  
CalFresh Management Operations Section

Paul Gardes  
CalFresh Policy Bureau

Jacqueline Hom  
Refugee Programs Bureau

Joe Torres, Office of Civil Rights  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Andrew Riesenbergs  
USDA Food and Nutrition Services  
Supplemental Nutrition Assistance Program (SNAP)  
Western Region

Kevin Aslanian  
Coalition of California Welfare Rights Organizations, Inc.

Antoinette Dozier  
Western Center on Law and Poverty

**RIVERSIDE COUNTY**  
**DEPARTMENT OF PUBLIC SOCIAL SERVICES**  
**CORRECTIVE ACTION PLAN**  
**FOR**

**Riverside County Department of Public Social Services**  
**Assurance and Review Services**  
**10281 Kidd Street**  
**Riverside, California 92503**

**Prepared by**  
**Jennifer Faler**  
**Civil Rights Investigator**  
**(951) 358-7083**  
**[jfaler@riversidedpss.org](mailto:jfaler@riversidedpss.org)**

## **TABLE OF CONTENTS**

- I. INTRODUCTION**
- II. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**
- III. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**
- IV. DOCUMENTATION OF APPLICANT/RECIPIENTS CASE RECORDS**
- V. STAFF DEVELOPMENT AND TRAINING**
- VI. DISCRIMINATION COMPLAINT PROCEDURES**
- VII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**
- VIII. CONCLUSION**

**Riverside County  
Department of Public Social Services  
Corrective Action Plan**

**I. INTRODUCTION**

The California Department of Social Services (CDSS) staff conducted a Civil Rights Compliance Review of Riverside County Department of Public Social Services (DPSS) September 15-19, 2014. CDSS found that Riverside County DPSS was in substantial compliance with the CDSS Manual of Policies and Procedures (MPP) Division 21 regulations, as well as other applicable State and Federal civil rights laws.

This Corrective Action Plan (CAP) will outline Riverside County DPSS' plan for addressing the issues identified during the 2014 compliance review. Included in our plan are the steps we will take to correct the deficiencies and the estimated timelines for completion (or date of implementation for on-going efforts such as staff development).

**II. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES**

The Americans with Disabilities Act requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The Federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measure necessary.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking, as well as accessibility to public telephones and restrooms.

CDSS staff evaluated the following Riverside County DPSS facilities during the course of their review:

- Riverside Office  
10281 Kidd Street, Riverside
- Mission Grove State Hearing Rooms  
7894 Mission Grove Parkway, Riverside
- Mead Family Resource Center  
21091 Rider Avenue, Perris
- Customer Call Center  
2300 Market Street, Riverside
- Mission Grove EAS  
7894 Mission Grove Parkway, Riverside

## Findings and Corrective Actions

### Facility Location # 1: Riverside Office

Facility Element	Findings	Corrective Action Required	Target Completion Date
Contracts	1) Three out of ten contracts pulled did not have the signed Vendor contract in the file.	1) Each contract must have a signed Vendor Assurance of Compliance Form – CR50.	DPSS was able to locate the CR50 form for the three contracts, and sent them to CRB.  Completed: 10/2014

### Facility Location # 2: Mission Grove State Hearing Rooms

- There were no findings for this location.

### Facility Location # 3: Mead Family Resource Center

Facility Element	Findings	Corrective Action Required	Target Completion Date
Outside Signage	1) The accessible signage International Symbol of Accessibility (ISA) was missing at entrance.	1) In existing buildings and facilities where not all entrances comply with Section 33, Doors, Doorways, and Gates, entrances complying with Section 33, Doors, Doorways, and Gates shall be identified by the International Symbol of Accessibility complying with “International Symbol of Accessibility” heading in Section 57, Signs & Identification. (CA T 24 11B-216.6) (ADA 703.6.2) pg. 376.	DPSS ARS has verified that the ISA has now been posted.  Completed: 09/2014
	2) The accessible signage International Symbol of Accessibility (ISA) at entrance needs to be non-glare with contrast.	2) Pictograms and their field shall have a non-glare finish. (CA T 24 11B-703.6.2) (ADA 703.6.2) pg. 376.  Note: Pictograms shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field. (CA T24 11B-703.6.2) (ADA 703.6.2) pg. 376.	DPSS ARS has verified that the ISA now meets the non-glare requirements.  Completed: 09/2014

Facility Element	Findings	Corrective Action Required	Target Completion Date
Lobby/Reception	1) Accessible counter in lobby was too high at 36". County does provide a table next to the counter measuring 28" and provides a clip board when needed.	1) The tops of dining surfaces and work surfaces shall be 28" min. and 34" max. above the finish floor or ground. (CA T24 11B-902.3) (ADA 902.3) pg. 55.	DPSS ARS submitted a work order to DPSS Facilities to assess the counter to determine whether it can be lowered to 28".  Completed: 08/2015
	2) Door pressure too high at double entrance doors, left side heavy at 7 lbs., right side heavy at 9 lbs.	2) The force for pushing or pulling open a door or gate other than fire doors shall be as follows:  1. Interior hinged doors and gates: 5 lbs. max. 2. Sliding or folding doors: 5 lbs. max. 3. Required fire doors: the minimum opening force allowable by the appropriate administrative authority, not to exceed 15 lbs. Exterior hinged doors: 5 lbs. max. (CA T24 11B-404.2.9 (1-4)) (ADA 902.3) pg. 55.	DPSS ARS submitted a work order to DPSS Facilities to assess the door pressure in order to ensure that it meets the 5 lb. max.  Completed: 08/2015

**Facility Location # 4: Market Street Call Center**

- There were no findings for this location.

**Facility Location # 5: Mission Grove EAS**

- There were no findings for this location.

### **III. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON ENGLISH-SPEAKING OR WHO HAVE DISABILITIES**

Counties are required by Division 21 requires to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delay. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English speaking persons. In offices where bilingual staff is not required because non-English speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

#### **Findings and Corrective Actions**

<b>Area of Finding</b>	<b>Corrective Action Required</b>	<b>Action Item</b>	<b>Target Completion</b>
Timely Service	1) RCDPSS must ensure that bilingual/interpretive services are prompt and without undue delay. (Div. 21-115)	1) DPSS has an existing Department Memorandum (DM) which addressed interpreter services being provided within 72 hours. The most recent update to this DM was in 06/2015 (DM 2015-097)	Completed: 06/2015

### **IV. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS**

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant/recipient's request for auxiliary aids and services.



## Findings and Corrective Actions

Area of Finding	Corrective Action Required	Action Item	Target Completion
General	1) RCDPSS must ensure that proper documentation is kept in file that identifies all the required elements to ensure compliance. (Div. 21-116)	1) DPSS ARS will be issuing a department-wide e-blast that will remind staff of the required documentation for complying with Division 21-116 regulations.	Annually Beginning: 10/2015

## V. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as in the continuing training programs.

## Findings and Corrective Actions

Area of Finding	Corrective Action Required	Action Item	Target Completion
Division 21, Civil Rights Training	1) Riverside County shall ensure that employees receive Division 21 civil rights training at the time of orientation, as well as ongoing training to ensure that public contact staff has knowledge of Division 21, including familiarization with the discrimination complaint process. (Div. 21- 117.1)	1) DPSS has implemented a mandatory on-line refresher course on Division 21 requirements and has updated Department Policy.  2) DPSS will be disseminating information on Division 21 requirements by issuing quarterly department-wide e-blasts.	Completed: 09/2014  Annually Beginning: 10/2015

Area of Finding	Corrective Action Required	Action Item	Target Completion
Cultural Awareness Training	1) Riverside County shall ensure that all public contact employees receive cultural awareness training to ensure that public contact staff has an understanding of and sensitivity to the various cultural groups in the county's population. (Div. 21-117.2)	1) All DPSS employees receive mandatory cultural competency training (Diversity in the Workplace) provided through the county's Staff Development Department.	Currently in place

## VI. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution.

### Findings and Corrective Actions

Area of Finding	Corrective Action Required	Action Item	Target Completion
Discrimination Process	1) Riverside County shall ensure staff have knowledge of the discrimination complaint process and are able to differentiate it from other complaint processes. (Div. 21-117 and 21-203)	1) DPSS will be disseminating information on Division 21 requirements by issuing quarterly department-wide e-blasts.	Annually Beginning: 10/2015
Civil Rights Coordinator	1) Riverside County shall ensure that staff is knowledgeable regarding contact information of the civil rights coordinator, at minimum, where the information can be located. (Div. 21-117 and 21-107.21)	1) DPSS Civil Rights Coordinator and DPSS Civil Rights Investigator are visiting every DPSS office in an attempt to familiarize themselves with staff and make their role and services known.	1) Annual visits to each office are being conducted

**VII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL**

The Riverside County Department of Public Social Services Civil Rights Compliance Plan for the years 2014-2015 was received, and it is approved as submitted.

**VIII. CONCLUSION**

Riverside County Department of Public Social Services wishes to thank CDSS reviewer Cindy Guzman for her helpful and friendly presence and for working with us to identify areas of needed improvement in order to achieve Division 21 compliance.